

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**CERTIFICATION OF SETH
A. GOLDBERG, ESQ.**

SETH A. GOLDBERG, ESQ., being of full age, certifies as follows:

1. I am a Partner at Duane Morris LLP, attorneys for Defendants Zhejiang Huahai Pharmaceutical Co, Ltd., Princeton Pharmaceutical Inc., and Solco Healthcare US, LLC. I am also Lead Counsel and Liaison Counsel for all Defendants in this MDL. I make this Certification based on personal knowledge and in support of the Defendants' Joint Motion to Exclude the Opinions of Mahyar Etminan, PharmD, MSc.

2. Attached hereto as Exhibit A is a true and accurate copy of the Expert Report of Dr. Mahyar Etminan, PharmD, MSc (Epidemiology), dated July 6, 2021, served in MDL 2875.

3. Attached hereto as Exhibit B is a true and accurate copy of the transcript of Day 1 of the deposition of Mahyar Etminan, PharmD, MSc, in MDL 2875, dated August 24, 2021.

4. Attached hereto as Exhibit C is a true and correct copy of the transcript of Day 2 of the deposition of Mahyar Etminan, PharmD, MSc, in MDL 2875, dated August 25, 2021.

5. Attached hereto as Exhibit D is a true and correct copy of “Endogenous versus exogenous exposure to *N*-nitroso compounds and gastric cancer risk in the European Prospective Investigation into Cancer and Nutrition (EPID-EURGAST) study” by Jakszyn, et al.

6. Attached hereto as Exhibit E is a true and correct copy of “N-Nitrosodimethylamine-Contaminated Valsartan and the Risk of Cancer” by W. Gomm, et al.

7. Attached hereto as Exhibit F is a true and correct copy of “Use of N-nitrosodimethylamine (NDMA) contaminated valsartan products and risk of cancer: Danish nationwide cohort study” by A. Pottegard, et al.

8. Attached hereto as Exhibit G is a true and correct copy of “Lifetime exposure to rubber dusts, fumes, and N-nitrosamines and cancer mortality in a cohort of British rubber workers with 49 years follow-up” by Hidajat, et al.

9. Attached hereto as Exhibit H is a true and correct copy of excerpts of the transcript of the deposition of Dipak Panigrahy, M.D., in MDL 2875, dated September 10, 2021.

10. Attached hereto as Exhibit I is a true and correct copy of “Risk of colorectal and other gastro-intestinal cancers after exposure to nitrate, nitrite and *N*-nitroso compounds: a follow-up study” by Knekt, et al.

11. Attached hereto as Exhibit J is a true and correct copy of “*N*-nitroso compounds and cancer incidence: the European Prospective Investigation into Cancer and Nutrition (EPIC)-Norfolk Study” by Loh, et al.

12. Attached hereto as Exhibit K is a true and correct copy of “Dietary *N*-nitroso compounds, endogenous nitrosation, and the risk of esophageal and gastric cancer subtypes in the Netherlands Cohort Study” by Keszei, et al.

13. Attached hereto as Exhibit L is a true and correct copy of “Dietary *N*-nitroso compounds and risk of pancreatic cancer: results from a large case-control study” by Zheng, et al.

14. Attached hereto as Exhibit M is a true and correct copy of “Exposure to high concentrations of nitrosamines and cancer mortality among a cohort of rubber workers” by Straif, et al.

15. Attached hereto as Exhibit N is a true and correct copy of “Red Meat, Dietary Nitrosamines, and Heme Iron and Risk of Bladder Cancer in the European Prospective Investigation into Cancer and Nutrition (EPIC)” by Jakszyn, et al.

16. Attached hereto as Exhibit O is a true and correct copy of “Nitrosamines and Heme Iron and Risk of Prostate Cancer in the European Prospective Investigation into Cancer and Nutrition” by Jakszyn, et al.

17. Attached hereto as Exhibit P is a true and correct copy of “Occupational Risk Factors for Non-Hodgkin’s Lymphoma: A Population-Based Case-Control Study in Northern Germany” by Richardson, et al.

18. Attached hereto as Exhibit Q is a true and correct copy of “Occupational exposure to *N*-nitrosamines and pesticides and risk of pancreatic cancer” by Fritschi, et al.

Respectfully submitted,

/s/ Seth A. Goldberg

Seth A. Goldberg, *Lead Counsel and
Liaison Counsel for Defendants*

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Dated: November 1, 2021